



State of Washington DEPARTMENT OF FISH AND WILDLIFE

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c/o Department of Ecology 1315 W 4th Ave, Kennewick, WA 99336

17 June, 1996

Robert McLeod U.S. Department of Energy P.O. Box 550 Richland, WA 99352

Dear Mr. McLeod:



Re: Comments on Natural Resource Related Design Documents for the 300-FF-1 Operable Unit at the 60% Remedial Design Development Level.

Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to provide comments on documents titled *Site Restoration Plan for the 300-FF-1 Operable Unit Liquid Waste Sites, Landfills, and Burial Ground 618-4*, BHI-00799, Draft B, and *Mitigation Action Plan 300-FF-1 Operable Unit Remediation*.

General Comments

There are discrepancies between the Mitigation Action Plan and the Site Restoration Plan for the 618-4 burial ground. WDFW concurs with language in the mitigation action plan for seed types in section 3.3.3 Revegetation, subsection 618-4. However we disagree with language in the Restoration Plan in section 2.5.1 which mentions use of a non-native grass such as crested and Siberian wheatgrass for 618-4. We strongly recommend native species for restoration of 618-4 burial ground. This should also be specified in the objectives.

Second issue, the restoration plan needs fleshed out with details. I am enclosing a flow chart for a successful restoration. I would like to emphasize the last three blocks in the flow chart: Revegetation procedure, Site monitoring, Evaluate and institute corrective actions as needed. The restoration plan needs detail in these three areas. The monitoring plan should include performance criteria, monitoring methods and annual report. The monitoring and performance criteria should be tied directly to corrective actions to reach the performance criteria. Another issue that needs developed is a maintenance schedule. Finally, the project should ensure monitoring and maintenance funding.

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Currently, the north end of the operable unit is considered level 3 in the Biological Resource Management Plan. However, once restoration of the 618-4 is completed, the burial ground will fall under level 4 protection. What steps are being developed to ensure this level of protection. Will there be deed restrictions?

Thank you for the opportunity to provide comments. If you have any questions, please contact me at 509/736-3095.

Sincerely,

Jay McConnaughey

Habitat Biologist, Hanford Site

jlm

Enclosure

CC:

Dave Lundstrom, Ecology Ted Wooley, Ecology Brent Renfrow, WDFW

Steps to Consider for Revegetation Projects

